

EXHIBIT B

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

Jimmie Stringer,)
)
Plaintiff,)
)
v.) Case No.
)
Dr. V. White of Lifelong Medical Clinic,)
)
Defendant.)

DECLARATION OF
MEREDITH TORRES

1. I am a Senior Attorney in the General Law Division, Office of the General Counsel, Department of Health and Human Services (the "Department"). I am familiar with the official records of administrative tort claims maintained by the Department as well as with the system by which those records are maintained.
2. The Department's Claims Branch maintains a computerized database record of administrative tort claims filed with the Department, including those filed with respect to federally supported health centers that have been deemed to be eligible for Federal Tort Claims Act malpractice coverage.
3. As a consequence, if a tort claim had been filed with the Department with respect to Lifelong Medical Care a record of that filing would be maintained in the Claims Branch's database.
4. I caused a search of the Claims Branch's database to be conducted and found no record of an administrative tort claim filed by Jimmie Stringer or an authorized representative

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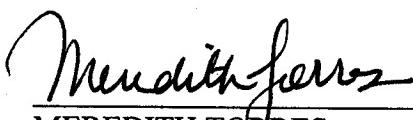
relating to Lifelong Medical Care, or Vaneida White, M.D.

5. I have also reviewed official agency records and determined that Lifelong Medical Care was first deemed eligible for Federal Tort Claims Act malpractice coverage effective February 1, 1998, and that its deemed status has continued without interruption since that date. Copies of the notifications by an Assistant Surgeon General, Department of Health and Human Services, to Lifelong Medical Care are attached to this declaration as Exhibit 1.

6. Official agency records also indicate that Vaneida White, M.D., was an employee of Lifelong Medical Care, at all times relevant to the complaint in this case.

I declare under penalty of perjury that the foregoing is true and correct. 28 U.S.C. § 1746.

Dated at Washington, D.C., this 17th day of October, 2007.



MEREDITH TORRES
Senior Attorney, Claims and Employment Law Branch
General Law Division
Office of the General Counsel
Department of Health and Human Services